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Attorney for:
JOEY JOSE LOPEZ

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON
(Honorable Stanley A. Bastian)

UNITED STATE OF AMERICA,)	NO. 4:21-CR-6019-SAB-1
Plaintiff,)	
vs.)	MOTION AND DECLARATION FOR
)	EXTENSION OF TIME TO FILE
)	PRETRIAL MOTIONS
JOEY JOSE LOPEZ,)	
Defendant.)	February 17, 2023
)	Richland – Without Oral Argument

COMES NOW, Ken Therrien, the attorney for the defendant Joey Jose Lopez and moves the court for an order extending time to file its pretrial motions. This motion is based upon the files and records herein and the Declaration of Counsel filed herewith.

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MOTION AND DECLARATION FOR EXTENSION OF
TIME TO FILE PRETRIAL MOTIONS
Page 1

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DECLARATION

Ken Therrien upon oath deposes and states:

I am the Attorney for the defendant. I was appointed to this case on July 22, 2021 (ECF No. 6).

Mr. Lopez was arraigned on July 26, 2021 (ECF No 11). Counsel for Mr. Lopez is requesting an extension to file Pre-Trial Motions. The current deadline to file pretrial motions is January 18, 2023. Additional time is necessary for defense counsel to prepare pre-trial motions to adequately and effectively represent Mr. Lopez in this case.

Counsel has contacted AUSA's Stephanie Van Marter regarding the extension to February 1, 2023. At the time of the filing, Counsel has yet to receive a response from AUSA Van Marter.

Dated this 18th day of January, 2023.

/s/ Ken Therrien

KEN THERRIEN, WSBA #20291

Attorney for Joey Jose Lopez

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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury of the laws of the State of Washington that on January 18, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

- Stephanie Van Marter, Assistant United States Attorney
- Chad Mitchell, Attorney for Defendant

s/ Ken Therrien

KEN THERRIEN, WSBA #20291

Attorney for Joey Jose Lopez

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